



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Eleanor M. Lackman
Partner
(212) 878-4890 Phone
(917) 546-7675 Fax
eml@msk.com

July 18, 2022

VIA ECF ONLY

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12C
New York, New York 10007-1312

Re: McGucken v. Shutterstock, Inc., et al., No. 1:22-cv-00905-GHW

Dear Justice Woods:

This firm represents defendant Shutterstock, Inc. ("Shutterstock") in connection with the above-captioned action.

Pursuant to the teleconference held on July 13, 2022 and Your Honor's Order dated July 14, 2022 (ECF Doc. No. 14) enclosed is: (1) a blackline of the revised proposed protective order including language regarding how documents designated as "Highly Confidential – Attorneys' Eyes Only" in other proceedings will be handled; and (2) a clean copy of the same for endorsement.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML' followed by a surname.

Eleanor M. Lackman

EML/eln
Enclosures